

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2019-169-E

In the Matter of:

Duke Energy Progress, LLC's
Establishment of a Net Energy
Metering Tariff in Compliance with
H. 3659

PETITION TO INTERVENE

The South Carolina Coastal Conservation League ("CCL"), Southern Alliance for Clean Energy ("SACE"), and Upstate Forever (collectively, "Petitioners"), respectfully petition the Public Service Commission of South Carolina ("Commission") to intervene in the above-captioned proceeding pursuant to R.103-825 of the Commission's Rules of Practice and Procedure. In support of its petition, Petitioners state as following:

1. CCL is a nonprofit organization whose mission is to protect the natural environment of the South Carolina coastal plain and to enhance the quality of life in its communities by working with individuals, businesses, and government to ensure balanced solutions. CCL supports the development of energy policy that is in the public interest of South Carolinians. The principal address of CCL is 131 Spring Street, Charleston, South Carolina, 29403.
2. SACE is a regional nonprofit organization whose mission is to promote responsible energy choices that address global climate change and ensure clean, safe and healthy communities throughout the Southeast. SACE has its principal office in

Tennessee, with a mailing address of Post Office Box 1842, Knoxville, Tennessee, 37901. SACE also has offices in North Carolina, South Carolina, Georgia, and Florida.

3. Upstate Forever is a non-profit, membership-based organization existing under the laws of the State of South Carolina. Upstate Forever promotes sensible growth and the protection of the critical lands, waters, and unique character of Upstate South Carolina. The principal address of Upstate Forever is 507 Pettigru Street, Greenville, South Carolina, 29601.

4. Petitioners have intervened in Docket No. 2019-182-E, the generic net metering docket underway, and were active participants in the procedural discussions and stakeholder technical workshops held on March 12, 2020 and April 23, 2020..

5. Petitioners CCL and SACE also participated actively in and were parties to the settlement reached in Docket No. 2014-246-E establishing the current Net Energy Metering (“NEM”) Methodology and in Docket Nos. 2015-203-E, 2015-204-E, 2015-205-E establishing the net metering tariffs for Duke Energy Carolinas (“DEC”), Duke Energy Progress (“DEP”), and South Carolina Electric & Gas (now Dominion Energy South Carolina (“DESC”)), respectively. CCL and SACE have also participated in the past five years of utility annual fuel clause filings in which the required amount of each utility’s NEM Incentive is calculated.

6. Petitioners and their members have a direct and substantial interest in this proceeding. Petitioners have members who are customers of DEP and are therefore subject to the direct impacts of utility net metering tariffs and the net metering policies established by the Commission in this docket. Petitioners and their members are

interested in promoting greater reliance on distributed renewable resources to meet South Carolina's energy needs.

7. This Petition to Intervene is timely filed, as the Commission has not yet established an intervention deadline for this proceeding.

8. Petitioners are represented by the following counsel in this proceeding:

Katherine Lee
Southern Environmental Law Center
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Charleston, SC 29403
Telephone: (843) 720-5270
Fax: (843) 414-7039

WHEREFORE, Petitioners pray that they be allowed to intervene in this docket.

Respectfully submitted this 14th day of September, 2020.

s/ Katherine N. Lee
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CERTIFICATE OF SERVICE

I certify that the following persons have been served with one (1) copy of this firm's Petition to Intervene by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

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September 14, 2020

/s/ Emily E. Selden

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September 14, 2020

/s/ Emily E. Selden